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May 7, 1999

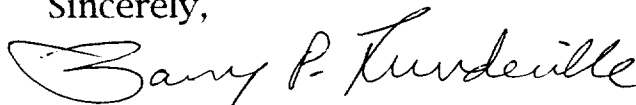
Ms. Magalie Roman-Salas
Office Of The Secretary,
Federal Communications Commission
445 12th Street S.W.; TW-A325
Washington D.C. 20554

Dear Ms. Roman-Salas:

Enclosed please find an original and five copies of my
Comments and Counterproposal to the proposed rule making for the
addition to the FM table of allotments of channel 254A in Stratford,
New Hampshire. I appreciate your consideration of this matter.

Please direct any questions regarding this matter to the
undersigned. Thank you.

Sincerely,



Barry P. Lunderville
20 Middle Street.
Lancaster, NH 03584
603-788-3636

*note: Barry P. Lunderville is the Licensee of Station WXXS-FM,
Lancaster, New Hampshire.

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Before the
Federal Communications Commission
Washington, DC 20554

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In Re:

Amendment of Section 73.202(b))
Table of Assignments) MM Docket 99-84.
FM Broadcast Stations) RM-9501

Lincoln & Stratford,
New Hampshire)

To: Chief, Allocations Branch

Comments & Counterproposal to new FM, Stratford, New Hampshire

Barry P. Lunderville hereby respectfully requests that the FCC make the following addition to the FM table of allotments:

ADD Channel 254A, Lincoln, New Hampshire, as the community's first local Commercial FM service.

Coordinates: 44-08-43 NL and 71-34-23WL

This proposal will bring first service to the community of Lincoln, New Hampshire, an incorporated town in Grafton County, New Hampshire, with a population of 1,229 persons. The proposed allotment requires a site restriction of 13.9 kilometers to the Northeast to avoid short-spacing. (Please note that the coordinates for the US Post Office in Lincoln are 44-2-30 NL and 71-40-13 WL, and that they differ from those listed in the U.S. Census Bureau Gazetteer for which there is a link on the FCC Web site) Canadian concurrence in the allotment is required since Lincoln, New Hampshire, is located within 320 kilometers (200 miles) of the U.S. Canadian border.

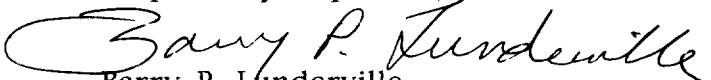
Since channel 254 is the only channel that will meet the Commission's domestic spacing requirements in Lincoln, New Hampshire, and since the population of Lincoln is greater than the population of Stratford, (Lincoln, Population: 1,229. Stratford, Population: 927) it would seem to be in the public interest for the Commission to deny the Peter George proposal for stratford, and allot channel 229-A to Lincoln.

The petitioner states that he will, if the Commission makes this assignment, apply for and build the subject station in a timely manner.

Comments & Counterproposal to new FM, Stratford, New Hampshire, Cont.

* The petitioner notes that this proposal is fully spaced to the recently proposed allotment of channel 256-A to Whitefield, (MM Docket Number 99-42, RM-9467) with 34.6 kilometers between allocation points.

Respectfully requested,


Barry P. Lunderville

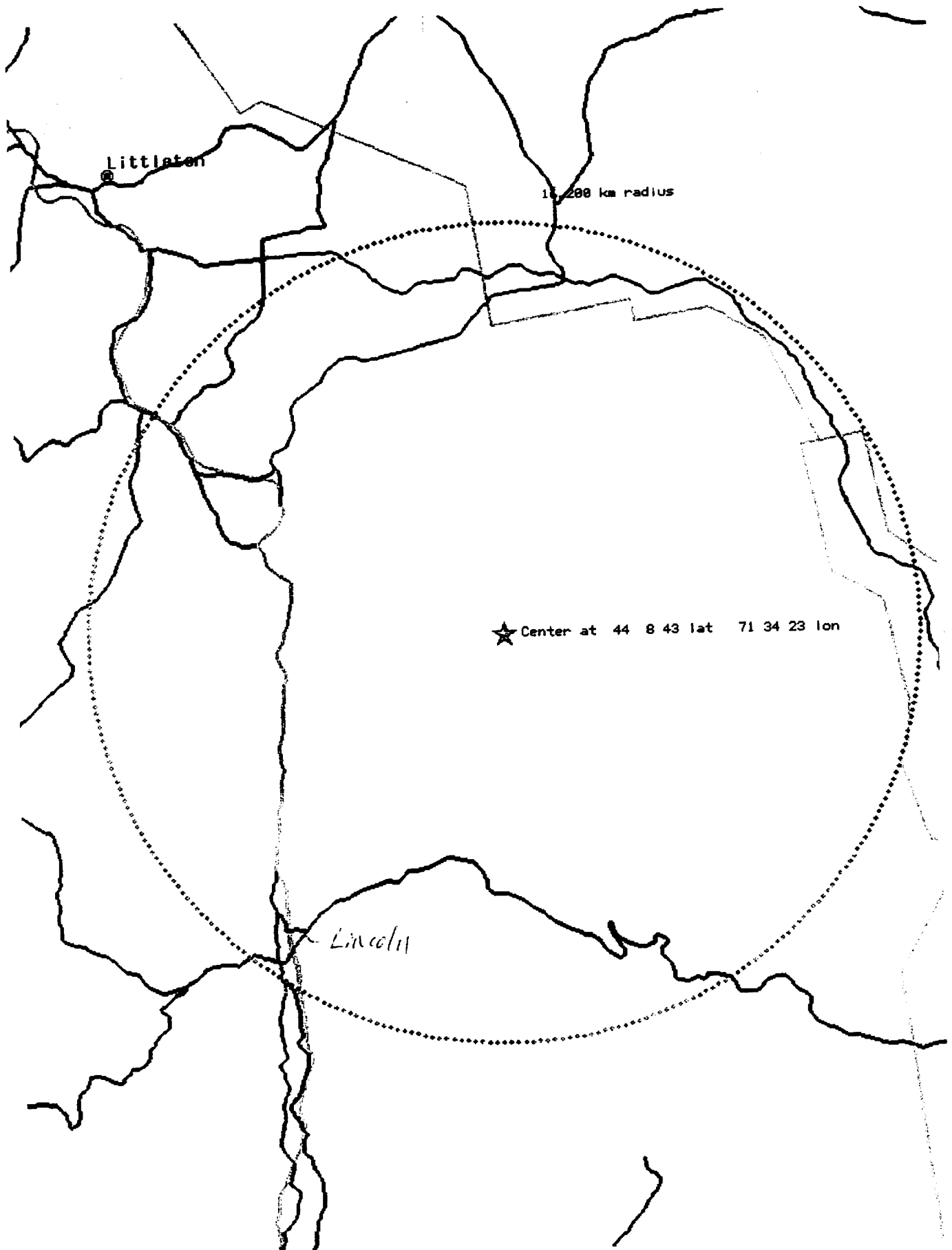
20 Middle Street
Lancaster, NH 03584

Phone: 603-788-3636

MAPFM search of channel 254A6 (98.7 MHz), at N. 44 8 43, W. 71 34 23.

Searching Channel 254A6 (98.7 MHz):

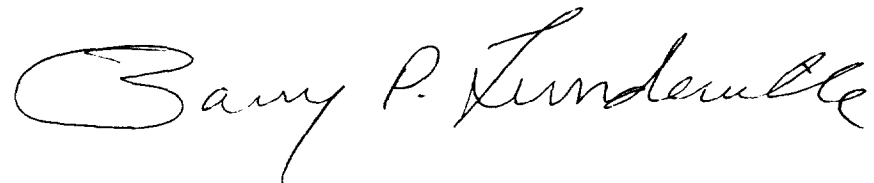
CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
JEW	Rochester	NH	201	A	A	60.6	6.2	158.2°	54.4
JEW	Norwich	VT	201	B	A	65.7	9.3	222.0°	56.4
ALC	Rutland	VT	251	C2	U	72.6	34.2	239.1°	38.5
WJJR	Rutland	VT	251	C2	L	72.6	34.2	239.1°	38.5
ALC	Laconia	NH	252	C3	V	36.2	26.1	162.3°	10.1
ALC	Laconia	NH	252	A	U	38.1	19.3	174.4°	18.8
VLNHFM	Laconia	NH	252	C3	A	38.1	26.1	174.4°	12.0
VLNHFM	Laconia	NH	252	A	L	38.1	19.3	174.4°	18.8
VGMT	Lyndon	VT	252	A	L	33.4	19.3	331.6°	14.2
WLEFM	Longueuil	QU	253	C1		136.6	112.5	313.4°	24.2
ALC	Boston	MA	253	B	U	128.1	70.2	172.1°	57.9
WBMX	Boston	MA	253	B	C	128.4	70.2	172.0°	58.2
WBMX	Boston	MA	253	B	L	128.1	70.2	172.1°	57.9
ALC	Waterville	ME	253	C1	U	102.9	82.6	68.2°	20.2
WBB	Waterville	ME	253	C1	L	101.4	82.6	73.4°	18.8
W253AE	Hanover, etc.	NH	253	D	C	49.4	0.0	226.8°	49.4
WCKMFM	Lake George	NY	253	A	L	120.3	44.7	245.4°	75.6
ALC	Winchester	NH	254	A	U	103.2	71.5	203.3°	31.8
ALC	Somersworth	NH	254	A	U	72.3	71.5	150.8°	0.8
WBY	Somersworth	NH	254	A	L	71.4	71.5	151.5°	-0.0
WOD	Winchester	NH	254	A	L	93.0	71.5	204.1°	21.5
WIKFM	Quebec	QU	255	C1		184.9	112.5	1.2°	72.5
ALC	Brunswick	ME	255	B	U	80.0	70.2	100.8°	9.8
WCLZFM	Brunswick	ME	255	B	L	80.0	70.2	100.8°	9.8
ALC	Burlington	VT	255	C1	U	83.3	82.6	284.7°	0.6
WOKO	Burlington	VT	255	C1	L	83.3	82.6	284.7°	0.6
ALC	Henniker	NH	256	A	U	67.7	19.3	190.7°	48.5
WNNH	Henniker	NH	256	A	L	69.3	19.3	189.3°	50.0
ALC	Windsor	QU	257	A		100.4	33.6	347.9°	66.8
ALC	Kennebunk	ME	257	A	U	77.5	19.3	132.4°	58.2
ALC	Farmington	ME	257	A	U	76.7	19.3	62.6°	57.5
WBQQ	Kennebunk	ME	257	A	L	76.4	19.3	132.0°	57.2
WKTJFM	Farmington	ME	257	A	L	76.7	19.3	62.6°	57.5
ALC	Hanover	NH	257	A	U	49.5	19.3	226.7°	30.2
W257AS	Franklin, etc.	NH	257	D	L	50.4	0.0	182.7°	50.4
WFRD	Hanover	NH	257	A	L	49.5	19.3	226.7°	30.2
W257AU	St. Johnsbury, etc.	VT	257	D	L	26.9	0.0	312.9°	26.9



NOTICE OF SERVICE

I hereby certify that a copy of the foregoing "counterproposal" has been served by US First Class Mail, postage prepaid on the 10th day of May, 1999, upon the following parties:

Peter George
33 Stetson St. , Apt #2
Whitman, MA 02382

Handwritten signature of Barry P. Lunderbelle in cursive script.